



February 14, 2014

Ontario Energy Board  
P.o. Box 2319  
2300 Yonge Street, 26<sup>th</sup> Floor  
Toronto, Ontario M4P 1E4  
Attn: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Fort Frances Power Corporation  
Application for 2014 Rates  
Application Board File EB-2013-0130

On December 20, 2013, Fort Frances Power Corporation ('FFPC') filed its Cost of Service Application for rates effective May 1, 2014. On January 27, 2014, FFPC received a letter from the Board following the preliminary review of the Application. The letter identified certain omissions and revisions required to comply with the Board's Filing Requirements and/or the associated spreadsheets, models and work forms.

FFPC has addressed the items in the order that they were identified by the Board. Additional information or clarification has been provided as requested and revised attachments of the Chapter Two Appendices, COS Checklist and additional work sheets are also provided as applicable.

FFPC's response consists of two paper copies and an electronic copy filed with the Board's web portal.

Sincerely,

A handwritten signature in blue ink, which appears to read 'Joerg Ruppenstein', is written over a long, horizontal blue line that extends to the right.

Joerg Ruppenstein  
President and CEO

Att.

**Fort Frances Power Corporation – Addendum for 2014 Cost of Service Application EB-2013-0130  
Response to Board Letter of Incomplete dated January 24, 2014**

Item No.	Chapter 2 or 5 Filing Requirement Reference (section)	Description
1	Ch. 2, sec 2.4.5	<p>Re: the publication in which the notice must appear, it is stated that information must be provided “whether it is a paid publication or not and the readership and circulation numbers.” Exh1.5.1, p.1 states that the publication is the Fort Frances Times“, with a circulation of approximately 4,000 unpaid circulation one day a week and paid subscriptions available daily”</p> <p>The number of paid subscriptions is not provided.</p>
		<p><b>FFPC Response:</b> FFPC has been advised by the Fort Frances Times that they currently circulate approximately 2,800 daily paid newspaper subscriptions throughout FFPC’s licensed service territory. In addition, approximately 1,000 daily paid subscriptions are also circulated to the surrounding area which is outside of FFPC’s licensed service territory.</p>
2	Ch. 2, sec. 2.5.1.1 and 2.5.1.2	<p>Not evident whether continuity statements include interest during construction, which in any event is not broken out or referenced. Breakdown by function of Gross Assets is not provided.</p>

**FFPC Response:** FFPC’s continuity statements do not include interest during construction as none of FFPC’s capital projects have a lifecycle of more than one year. As such, interest during construction is not applicable to any capital projects discussed throughout this application. Due to the extreme winter conditions FFPC’s annual construction season begins at around the end of April and ceases around November. All assets constructed are placed into service or are ready for service prior the end of any fiscal year. As such, no projects are at the “Work in Progress” status at any year-end.

**FFPC has attached a Breakdown by function of Gross Assets below:**

Gross Asset by Function	CGAAP							Modified CGAAP	
	2006 Actual	2007 Actual	2008 Actual	2009 Actual	2010 Actual	2011 Actual	2012 Actual	2013 Bridge	2014 Test
Intangible Plant	2,905	4,995	20,535	25,765	29,094	29,094	29,854	57,354	61,354
Distribution Plant	8,354,370	8,517,608	8,671,738	8,830,134	9,109,847	9,109,847	9,738,213	9,906,373	10,579,189
General Plant	1,190,275	1,122,989	1,140,221	1,254,380	1,602,462	1,490,192	1,505,220	1,566,482	1,638,840
<b>Total</b>	<b>9,547,550</b>	<b>9,645,591</b>	<b>9,832,493</b>	<b>10,110,278</b>	<b>10,741,403</b>	<b>10,629,133</b>	<b>11,273,287</b>	<b>11,530,209</b>	<b>12,279,383</b>

**FFPC Response:** such as “14-18-001 (System Renewal): Fully Dressed Wood Poles Replacement Program”, which are not to be confused with multiyear capital construction projects. Under the multiyear programs, no construction projects are at a “work-in-progress” status at the end of any fiscal year. In the case of the capital Fully Dressed Wood Poles Program, all poles constructed (or replaced) are put into service prior to the end of every fiscal year, and annual construction is “complete”.

*(Question 2, cont.)*

- 3 Ch. 2, sec. 2.5.1.1 It is stated in this reference that “The opening and closing balances of gross assets and accumulated depreciation that are used to calculate the fixed asset component of rate base must correspond to the respective balances in the fixed asset continuity statements” and in the event they do not, an explanation and reconciliation must be provided. Exh 2.2.1 and App 2BA-1 show differences in Accumulated Depreciation for the 2013 Bridge and 2014 Test years that do not appear to be explained. For 2013, Exh 2.2.1 shows \$8,132,182 versus Appendix 2-BA-1’s \$8,246,914 and for 2014 \$8,339,639 versus \$8,548,638. The same issue arises for reconciliation to calculated depreciation expenses.

**FFPC Response:** There is a difference in the Accumulated Depreciation and Depreciation Expense for the 2013 Test and 2014 Bridge year when comparing Exhibit 2.2.1 to Appendix 2BA-1, due to a difference in applied amortization rates. Appendix 2BA-1 was completed using FFPC’s current (historic) amortization rates under CGAAP; however, Exhibit 2.2.1 was completed using FFPC’s revised amortization rates under CGAAP which are planned to be implemented for the 2013 Test Year and years forward.

Over the last several years FFPC devoted significant effort towards componentizing its Property Plant & Equipment and to assign useful service lives to individual asset groups as well as to individual assets with the assistance of its GIS system. Most revised life expectancies are in alignment with the Typical Useful Life values established in the “Kinectrics Report”; however, several asset groups were assigned slightly different life expectancies as per the outcomes of FFPC’s asset management process. Most deviations from the TUL are related to FFPC’s Greater than 50 kV Transformer Station Assets, which are expected to have a slightly longer service life than that contained in the “Kinectrics Report” as per the advice of Siemens Canada, who performs annual condition assessments of the assets. Many assets have already achieved or surpassed the Kinectrics TUL milestone and are still in good health.

For the 2013 Test Year FFPC is planning to revise its amortization rates for Property Plant & Equipment (PP&E) to better align the life expectancies of assets owned with the outputs of FFPC’s newly developed Asset Management Process. In summation, historically FFPC depreciated assets at a slightly higher rate than their true rate of deterioration. A summary of the difference in life expectancies and corresponding depreciation rates is located in Appendix 2 under Tab “Appendix 2-BB Service Life Comp”.

For the 2013 Test Year, the difference between the historic and proposed

**FFPC Response:** amortization rates results in a reduction in amortization expense in the amount of \$114,732. This difference explains the discrepancy between Exh 2.2.1 and App 2BA-1 with respect to Accumulated Depreciation for the 2013 Test year of \$8,132,182 and \$8,246,914 ( $\$8,132,182 - \$8,246,914 = \$114,732$ ). The difference in depreciation rates is also detailed in Appendix 2 under tab "App. 2-YB\_CGAAP\_SUMMARY\_IMPACTS".

For the 2014 Test year, the difference between the historic and proposed amortization rates results in a reduction in amortization expense in the amount of \$94,267. This difference added to the difference from the 2013 Test Year ( $\$114,732 + \$94,267 = \$208,999$ ) explains the discrepancy between Exh 2.2.1 and App 2BA-1 with respect to Accumulated Depreciation for the 2014 Bridge Year of \$8,339,639 and \$8,548,638 ( $\$8,548,638 - \$8,339,639 = \$208,999$ ).

- 4 Ch. 2, sec. 2.5.2.2 Applicants must also provide a complete appendix 2-AA along with the following information about capital expenditures on a project-specific basis. This information is incremental to the requirements in Chapter 5:
- Written explanation of variances, including that of actuals versus the Board-approved amounts for the applicant's last Board-approved cost of service application; and
  - For capital projects that have a project life cycle greater than one year, the proposed accounting treatment, including the treatment of the cost of funds.

FFPC has provided Appendix 2-AA, but has not provided the additional information per the Filing Requirements, Chapter 2.

**FFPC Response:** FFPC last rebased its rates in 2006 through the EDR process at which time filing requirements were considerably different from current filing requirements. Under the 2006 Filing requirements, FFPC was not required to conduct an actual versus Board approved amounts variance analysis on individual capital projects and as such, FFPC is not able to conduct this analysis.

FFPC has; however, included several analyses throughout Exhibit 2 of the application including Rate Base, Gross Assets, Accumulated Amortization variance analyses. The Gross Asset variance analysis in Exhibit 2, Tab 2, Schedule 3 also includes an explanation of material capital additions by asset group, as well as includes a detailed summary table of all annual capital additions. The capital additions summarize FFPC's annual capital programs.



- 5 Ch. 2, sec. 2.6.1.3 In Appendix 2-I, FFPC has used a total loss factor of 4.06% to “gross up” the CDM adjustment to adjust the system purchased kWh; this is different from FFPC’s proposed total loss factor of 4.70%. FFPC has not provided any explanation for the difference.

**FFPC Response:** FFPC has amended Appendix 2-I to the correct proposed total loss factor of 4.70 %. FFPC has determined this change to ‘Manual Adjustment for 2014 Load Forecast (system purchased basis)’ on Appendix 2-1 resulted in an increase of 7,351 kWh.

FFPC’s current Board approved loss factor of 4.06% was established during FFPC’s 2006 EDR. FFPC is requesting that this loss factor be adjusted to reflect actual losses experienced. In recent history FFPC has experienced a significant reduction in the volumetric and peak load of its customer base. Due to the sustained reductions in demand for electricity, FFPC’s distribution system is essentially operating in a less efficient zone. A material contributor to the increased system losses are the increased number of “idling” transformers operating below 50% of their capacity. Transformers are typically designed for an optimum operating efficiency at 50% full load.

- 6 Ch. 2, sec 2.6.2 Load forecast data for Historic Board Approved is required. This is not provided.

**FFPC Response:** FFPC apologizes for this omission and has supplied the attached file: ‘FFPC\_Historic\_Load\_Forecast.zip’.

- 7 Ch. 2, sec. 2.7.3.2 For shared services and Appendix 2-N, pricing methodologies are not adequately described (e.g. descriptions such as “contract,” “based on time sheet” do not describe the pricing methodologies). There is no discussion as to why the pricing methodology was chosen, no ARC conformity statement, no % allocated and no variance explanations.

**FFPC Response:** FFPC has amended Appendix 2-N to provide detailed descriptions of the shared services. To the best of FFPC’s knowledge and understanding, FFPC is in full compliance with the requirements of the ARC. Please see the revised file:

FFPC\_2014\_Custom\_Chapter2\_Appendices\_Rev\_20140208.

- 8 Ch. 2, sec. 2.7.3.3 This section requires that for any transactions above the materiality threshold (which for FFPC is \$50,000) that were procured without a competitive tender, an explanation as to why this was the case. There are a number of transactions shown in Exh 4.2.6, p.2 which exceed the materiality threshold and do not appear to have been procured through competitive tender for which no explanation is provided.

**FFPC Response:** It is important to note that the summary table found on Exhibit 4, Tab 2, Schedule 6, Page 2 of 2 summarizes the total dollar value of one or more transaction by vendor. FFPC would like to provide this additional information to clarify the purchases in question.

**Additional Information on Transaction Using "Purchase Orders"**

**1. 2007 Transactions: Carte International Inc. \$57,182**

FFPC exceeded its materiality threshold as a result of multiple independent purchases at this vendor in 2007. It is important to note that the \$57,182 spent at this vendor during the 2007 calendar year is the result of seven individual and independent projects. Three of these projects arose over the course of the year based on customer requested projects (customer capital projects). As such, none of individual projects or transactions exceeded the materiality threshold of \$50,000. FFPC therefore proceeded to purchase the necessary distribution equipment utilizing Purchase Orders. It is worth noting that FFPC conducts historic price comparisons on all of its material purchases to ensure that current pricing is in alignment with historic purchases.

**2. 2009 Transactions: Carte International Inc. \$75,002**

FFPC exceeded its materiality threshold as a result of multiple independent purchases at this vendor in 2009. It is important to note that the \$75,002 spent at this vendor during the 2009 calendar year is the result of five individual and independent projects. Three of these projects arose over the course of the year based on customer requested projects (customer capital projects). As such, none of individual projects or transactions exceeded the materiality threshold of \$50,000. FFPC therefore proceeded to purchase the necessary distribution equipment utilizing Purchase Orders.

**3. 2010 Transactions: Tomkins Hardware. \$65,366**

This transaction corresponds to FFPC's purchase of an emergency backup generator for its main office. FFPC acquired the unit through the issuance of a Purchase Order; however, the purchase was based on the winner of competitive quotations. FFPC's purchasing policy allows for the use of competitive quotations as an alternative to the issuance of formal tenders.

- 9 Ch. 2, sec. 2.7.3.4 This section requires the applicant to identify one-time costs in the historical, bridge and test years. FFPC's checklist shows this as n/a. It would not seem to be the case that there would be no one-time costs for this entire period (for instance the costs of the 2014 application preparation would not be ongoing costs).

**FFPC Response:** FFPC has revised the COS Checklist to include the One-Time Costs, Regulatory and IFRS transition costs, Appendix 2-U and as shown in the attached:

**FFPC\_2014\_COS\_Checklist\_20140208.xlsx**

- 10 Ch. 2, sec. 2.7.3.6 In the LEAP Report, the Board determined that the greater of .12% of a distributor's Board approved distribution revenue requirement or \$2,000 should be used. FFPC has used \$2,000, but .12% of the revenue requirement appears to be \$2,388.

**FFPC Response:** FFPC agrees with the OEB findings and will use \$2,388 as the cost of LEAP, pending approval of FFPC's revenue requirement of \$1,989,765. FFPC respectfully realizes that further adjustments to the LEAP amount may be required to adjust to the final Board Approved Revenue Requirement.

- 11 Ch. 2, sec. 2.7.4 This section requires detailed explanations for using a service life that is different from the TUL in the Kinectrics Report and to perform a recalculation to determine the average remaining life of the opening assets on the day of making depreciation changes. Neither of these appear to be provided.

**FFPC Response:** Please note that detailed discussions regarding FFPC's adopted useful life values for its assets groups are provided throughout Section 5.3.2.2 of FFPC's DS Plan; however, FFPC would like to provide the following summary for ease of reference and for additional clarity.

Over the last several years FFPC devoted significant effort towards componentizing its Property Plant & Equipment and to assign useful service lives to asset groups, as well as to individual assets. FFPC was able to assign Useful Life (UL) values to individual assets with the assistance of a populated GIS system. The UL values assigned were in accordance to the outputs of FFPC's asset management process, which was built on the foundation of the information provided in the "Kinectrics Report". The majority of assets were assigned a UL in accordance to the TUL values established in the "Kinectrics Report"; however, some assets were assigned slightly different values based on available condition testing data obtained, expert advice received, as well as due to FFPC's asset management optimization practices.

**FFPC Response:** The following table summarizes the UL values assigned which were not in accordance to the TUL values contained in the “Kinectrics Report”. Please refer to table 1.5.11 on Exhibit 1, Tab 5, Schedule 9 for a listing of all adopted UL’s.  
*(Question 11, cont.)*

Summary of Assets Not Assigned Kinectrics Report TUL as Useful Service Life								
		Asset Details		Kinectrics Useful Life			FFPC Useful Life	
Parent*	#	Category  Component   Type		MIN UL	TUL	MAX UL	FFPC Adopted Useful Life (UL)	Average Remaining Useful Life Relative to FFPC Adopted UL (Years)
TS & MS	12	Power Transformers	Overall	30	45	60	58.0	20.0
			Bushing	10	20	30	44.0	6.0
			Tap Changer	20	30	60	58.0	20.0
	15	Station DC System	Overall	10	20	30	29.0	6.0
			Charger	20	20	30	29.0	6.0
	16	Station Metal Clad Switchgear	Overall	30	40	60	62.0	17.0
			Removable Breaker	25	40	60	62.0	17.0
	17	Station Independent Breakers		35	45	65	71.0	2.0
	18	Station Switch		30	50	60	62.0	21.0
	19	Electromechanical Relays		25	35	50	45.0	9.0
UG	22	Rigid Busbars		30	55	60	62.0	20.0
	23	Steel Structure		35	50	90	62.0	20.0
	36	UG Foundation		35	55	70	80.0	52.5
General Plant	40	Ducts		30	50	85	80.0	52.1
	41	Concrete Encased Duct Banks		35	55	80	80.0	46.5
	5	Station Buildings	Fence	25-60			62.0	20.0
			Roof	20-30			40.0	1.0

#### Transformer Station (TS) & Municipal Station (MS) Assets:

FFPC owns and operates one Greater than 50 kV Transformer Station “Fort Frances MTS”. FFPC has contracted Siemens Canada to perform annual maintenance inspection and repair work, as well as to conduct annual condition assessments of all core station components. FFPC’s core station components including Power Transformer and Station Metal Clad Switch Gear are expected to have an end of life date of 2034 based on condition test results, assuming current operating conditions and maintenance practices. As such, FFPC expects that the station as a whole will be at the end of its useful service life in 2034. FFPC has therefore assigned 2034 as the end of service life dates to the core station components. FFPC’s rationale is to depreciate the remaining value of the station assets over their remaining service life, which for most core assets is 2034. It is important to note that several station components such as the “Station Independent Breakers” and the “Station DC System” are expected to fail prior to 2034, and as such their amortization rates have been also been adjusted accordingly. It is also worth noting that many station components are approaching or have already surpassed the TUL established in the “Kinectrics Report”.

**FFPC Response:** **Underground (UG) Plant:**  
*(Question 11,  
cont.)*

FFPC's asset management process has established that Primary Underground Cable ducts will be replaced every second time that the cables which they house are replaced. FFPC has aligned the UL of its Primary TR XLPE Cables in Duct with the TUL of 40 years as per the "Kinectrics Report". Therefore FFPC expects that its underground ducts will have a life cycle of 80 years. As such, FFPC has assigned a UL of 80 years for UG Ducts, as well as to Concrete Encased UG Ducts.

Similarly, FFPC plans to replace UG transformer foundations every second time that the transformers mounted onto them are replaced. The UL of pad-mounted transformers was aligned with the TUL of 40 years as per the "Kinectrics Report". Therefore FFPC expects that its UG foundations will have a life cycle of 80 years. As such, FFPC has assigned a UL of 80 years to UG foundations.

#### **General Plant**

Lastly, the categories Fence and Roof are also assets located at FFPC's transformer station FFMTS. FFPC has performed ongoing maintenance on the fence including the replacement of access gates and expects that the fence will remain in good condition until 2034, when the station as a whole is expected to be decommissioned. The metal roofing on the station buildings have already exceeded the TUL and MUL as per the "Kinectrics Report", and as such FFPC has adjusted its UL to reflect this. FFPC is planning to refurbish the roof over the 2014 to 2018 planning horizon.

FFPC notes that the average remaining life of the opening assets on the day of making depreciation changes, January 1, 2013 and the individual asset values is detailed in the Chapter 2 Appendices, Sheet App2- CT\_NewCGAAP\_DepExp\_2013, column C & E.

- |    |                             |   |
|----|-----------------------------|---|
| 12 | Ch. 2, sec. 2..8<br>and 2.3 | Total Capitalization is required to equate to Total Rate Base, but this does not appear to be the case. Total Capitalization for Appendix 2-OA is \$4,856,584 versus Total Rate Base in Exh 2.1.1 of \$4,793,453. |
|----|-----------------------------|---|

**FFPC Response:** FFPC apologizes for this inaccuracy and has changed Total Capitalization for Appendix 2-OA to the correct total of \$4,793,453.

Please see the revised file:

FFPC\_2014\_Custom\_Chapter2\_Appendices\_Rev\_20140208.



- 13 Ch 2, sec 2.11.1 Applicant is required to provide a table comparing current and proposed monthly fixed charges with the floor and ceiling as calculated in the cost allocation study and include an explanation if the monthly fixed charge for any customer class exceeds the ceiling. FFPC has not provided the floor from the cost allocation study, nor explanations for MFCs that exceed the ceiling.

**FFPC Response:** FFPC has provided a revised table below comparing the current and proposed monthly fixed charges to include both the floor and ceiling charges as calculated in the cost allocation study.

**Fixed Charge Analysis**

Customer Class	Current Volumetric Split	Current Fixed Charge Split	Total	Proposed Fixed Rate Based on Current Fixed/Variable Revenue Proportions	2013 Rates From OEB Approved Tariff	Minimum System with PLCC Adjustment (Ceiling Fixed Charge From Cost Allocation Model)	Avoided Cost (Floor Fixed Charge From Cost Allocation Model)
Residential	41.12%	58.88%	100.00%	\$18.79	\$12.05	\$22.94	\$9.18
GS < 50 kW	38.91%	61.09%	100.00%	\$43.62	\$29.03	\$33.19	\$16.08
GS >50 to 4999 kW	63.01%	36.99%	100.00%	\$165.98	\$242.06	\$72.00	\$44.24
Street Lighting	18.56%	81.44%	100.00%	\$1.60	\$1.17	\$8.93	\$0.75
Unmetered and Scattered	13.29%	86.71%	100.00%	\$38.24	\$29.03	\$19.14	\$7.00
TOTAL							

FFPC has provided an explanation for the monthly fixed charges that exceed the ceiling as calculated in the cost allocation study.

**Explanation:**

The Fixed Charge Analysis above details the proposed monthly service charge for each customer class and the current volumetric and fixed charge split.

FFPC has rate classes that fall within and beyond the maximum and minimum boundaries determined by the Cost Allocation Model. The ideal for FFPC will be to eventually realign to an equitable 50% fixed and 50% variable split.

Residential and Street Lighting fixed charges are within the floor and ceiling boundaries. Both monthly fixed charges increased to adjust for increases to rate specific revenue requirement.

The fixed charges for GS <50 kW, GS>50 -4,999 kW and Unmetered and Scattered Load customers exceed the maximum ceiling for fixed charges.

The fixed charge for GS<50 kW have increased due to a 2.2% or \$116,048 increase in rate specific revenue requirement. FFPC maintained current fixed to variable splits and the resulting fixed charge increased to \$43.62.

The fixed charge for Unmetered and Scattered Load (USL) rate class exceeds the

**FFPC Response:** Fixed Charge ceiling of \$19.14. FFPC's USL rate class fixed charge is a monthly per customer charge, not a monthly per 'connection' charge, resulting in only one charge per customer per month. FFPC maintained existing fixed to variable splits that determine an increase to \$38.24 per month.

(Question 13,  
cont.)

The fixed charge for GS>50 -4,999 kW has decreased from \$242.06 per month to \$165.98 to represent a decrease in rate specific revenue requirement.

The Town of Fort Frances, which is the total service territory of the FFPC, is experiencing no growth and a stalled economy due to the closure of the local paper mill. FFPC has maintained current variable and fixed monthly charge ratios to maintain distribution revenue that could be reduced as a result of aging demographic, vacant housing and business closures.

- 14 Ch 2, sec 2.11.2 The distributor is required to ensure that the information provided in this section related to RTSRs is consistent with that provided in the working capital allowance section. There does not appear to be a confirmation of this in the application.

**FFPC Response:** FFPC would like to, within this addendum, add the following statement relating to the RTSRs:

'FFPC has completed the Retail Transmission Service Rates ("RTSRs") to be consistent with that provided in the working capital allowance calculation provided in Section 2.5.1.3 as it relates to rates such as RTSRs.'

- 15 Ch 2, sec 2.11.6 Distributors must ensure that the revenue from the proposed specific service charges corresponds with the evidence under Operating Revenues. FFPC is proposing the elimination of a number of specific service charges and increases in others showing a net increase of \$849 from these charges in 2014, but no calculations are provided to tie this increase into the specific changes proposed.

**FFPC Response:** FFPC has provided a table indicating projected specific charge revenue amounts in the page below totaling \$9,850 (\$9,849±):

**SPECIFIC SERVICE CHARGES -**

**Customer Administration**

	Metric	Current	#	Charges
Arrears certificate	\$	15.00	5	\$75
Statement of account	\$	15.00	5	\$75
Duplicate invoices for previous billing	\$	15.00	5	\$75
Request for other billing information	\$	15.00	20	\$300
Easement letter	\$	15.00		\$0
Income tax letter	\$	15.00	20	\$300
Account history	\$	15.00	20	\$300
Credit reference/credit check (plus credit agency costs)	\$	25.00	1	\$25
Returned cheque charge (plus bank charges)	\$	25.00	40	\$1,000
Legal letter charge	\$	15.00	5	\$75
Account set up charge/change of occupancy charge (plus credit agency costs if appl	\$	30.00	162	\$4,860
Special meter reads	\$	30.00		
Meter dispute charge plus Measurement Canada fees (if meter found correct)	\$	30.00		
Disconnect/Reconnect at meter - during regular hours	\$	65.00	20	\$1,300
Disconnect/Reconnect at meter - after regular hours	\$	185.00		\$0
Disconnect/Reconnect at pole - during regular hours	\$	185.00		\$0
Disconnect/Reconnect at pole - after regular hours	\$	415.00		\$0

**Other**

	Metric	Current	#	Charges
Install/Remove load control device - during regular hours	\$	65.00		
Install/Remove load control device - after regular hours	\$	185.00		
Service call - customer-owned equipment	\$	65.00	20	\$1,300
Service call - after regular hours	\$	165.00	1	\$165
Specific Charge for Access to the Power Poles \$/pole/year	\$	22.35		
			<b>Total</b>	<b>\$9,850</b>

- 16 Ch. 2, sec. 2.11.9 The distributor must also provide a marked-up (track changes) version of the currently approved tariff of rates and charges showing each proposed change. A side-by-side comparison is shown, but not a track changes version.

**FFPC Response:** FFPC has attached a marked-up (track changes) named:  
FFPC Tariff EB-2012-0083- Track Changes.docx

Please note that FFPC has discovered two inaccuracies in the EB-2012-0083 Tariff of Rates and Charges which have been corrected in the Track Changes revision of EB-2013-0130:

1. The description of the 'GENERAL SERVICE LESS THAN 50 KW SERVICE CLASSIFICATION' has been corrected to the EB-2011-0146 description.
2. The Service Charge for 'UNMETERED SCATTERED LOAD CLASSIFICATION' has been corrected to read 'Service Charge (per customer)', as per EB-2011-0146.

- 17 Ch 2, sec 2.11.10 Applicant is required to provide detailed calculations of revenue per rate class under current rates and proposed rates by customer class. The information for current rates does not appear to be provided.

**FFPC Response:** Please find the attachment:

**FFPC\_2014\_COS\_Revenue\_CurrentProposed.xlsx**

- 18 Ch 2, sec. 2.12 Applicant is required to identify which Group 2 accounts will continue and discontinue on a going-forward basis, with an explanation for each. This information does not appear to have been provided.

**FFPC Response:** FFPC apologizes for this omission and please find the table below detailing the proposed Group 2 accounts status and explanation:

Group 2 Account	USoA	Continue	Discontinue	Explanation
Other Reg Assets - Sub-Account - OEB Cost Assessments	1508		Discontinue	Disposition to be approved in this rate proceeding.
Other Reg Assets - Sub-Account - Deferred IFRS Transition Costs	1508	Continue		Needed until final disposition in future after implementation
Other Reg Assets - Sub-Account - Incremental Capital Charges	1508			Need may occur in future years.
Other Regulatory Assets- Sub-Account-Other	1508	Continue		Need may occur in future years.
Retail Cost Variance Account - Retail	1518	Continue		Need may occur in future years.
Special Purpose Charge	1521		Discontinue	Final disposition complete in prior proceeding.
Miscellaneous Deferred Debits	1525	Continue		Need may occur in future years.
Renewable Generation Connection Capital Deferral Account	1531		Discontinue	No longer needed if requested disposition is approved in this rate proceeding and all further expenditures would be included in Distribution System Plan.
Renewable Generation Connection OM&A Deferral Account	1532		Discontinue	
Renewable Generation Connection Funding Adder Deferral Acct	1533		Discontinue	
Smart Grid Capital Deferral Account	1534		Discontinue	
Smart Grid OM&A Deferral Account	1535		Discontinue	
Smart Grid Funding Adder Deferral Account	1534		Discontinue	
Retail Settlement Variance Account - STR	1548	Continue		Need may occur in future years.
Smart Meter Capital and Recovery Offset Variance Account	1555		Discontinue	Final disposition complete in prior proceeding.
Smart Meter Capital and Recovery Offset Variance Account, Sub-account Stranded Meter Costs	1555		Discontinue	Disposition to be approved in this rate proceeding.
Smart Meter OM&A Variance Account	1556		Discontinue	Final disposition complete in prior proceeding.
Deferred Payment in Lieu of Taxes	1562		Discontinue	Final disposition complete in prior proceeding.
Contra Account - PILS	1563		Discontinue	Not used by FFPC.
CDM Expenditures and Recovery	1565		Discontinue	Final disposition complete in prior proceeding.
CDM Contra Account	1566		Discontinue	Final disposition complete in prior proceeding.
Board Approved CDM Variance Account	1567	Continue		Need may occur in future years.
LRAM Variance Account	1568	Continue		Ongoing need.
Qualifying Transition Costs	1570		Discontinue	Final disposition complete in prior proceeding.
Pre-Market Opening Energy Variances	1571		Discontinue	Not used by FFPC.
Extra-Ordinary Event Costs	1572	Continue		Need may occur in future years.
Deferred Rate Impact Accounts	1574	Continue		Need may occur in future years.
Accounting Changes Under CGAAP	1576	Continue		Ongoing need.
RSVA - One-time	1582	Continue		Need may occur in future years.
PILS and Tax Variance for 2006 and Subsequent Years	1592		Discontinue	Proposal to eliminate tracking due to Not-for-Profit Status.
PILS and Tax Variance for 2006 and Subsequent Years, Sub-account HST / OVAT Input Tax Credits (ITCs)	1592		Discontinue	Proposal to eliminate tracking due to Not-for-Profit Status.

- 19 Ch 2, sec 2.12 Applicant is required to provide a breakdown of energy sales and cost of power by USoA as reported in AFS and mapped to USoA. Table 9.8 in Exh 9.2.2, p.2 shows total energy sales in 2012 of \$7,285,061.76, while the AFS shows \$7,148,968, but no reconciliation of these two numbers appears to have been provided.

**FFPC Response:** FFPC had provided a reconciliation of the 2012 Trial Balance mapped to the Audited Financial Statement in Exhibit 1, Table 1.5.6.

Within this table, the sub-total for the “Total Sales of Electricity” according to the USoA Account is \$7,285,061, while the Audited Financial Statement total is \$7,148,968, the difference being \$136,094.

The difference of \$136,094 was due to the incorrect grouping in the Audited Financial Statement of the ‘Generation Sales’ within the ‘Total Sales of Electricity’ group. The generation sales for the 2012 year end totaled a debit balance of \$136,094.

When the Audited Financial Statements ‘Total Sales of Electricity’ credit balance of \$7,148,968 reverses the debit amount for Generation of \$136,094:

$$-\$7,148,968 - +\$136,094.26 = -\$7,285,061.76$$

Please find a portion of Table 1.5.6 encapsulated below:

**2012 TRIAL BALANCE MAPPED TO AUDITED FINANCIAL STATEMENTS**

ACCOUNT	FINANCIAL STATEMENT SECTION	DESCRIPTION	USoA ACCOUNT	SUBTOTAL	AUDITED FINANCIAL STATEMENT	DIFFERENCE
4006	Sales of Electricity	Residential Energy Sales	\$ (3,018,435)			
4025	Sales of Electricity	Street Lighting Energy Sales	\$ (76,652)			
4035	Sales of Electricity	General Energy Sales	\$ (3,072,296)			
4050	Sales of Electricity	Revenue Adjustment				
4055	Sales of Electricity	Energy Sales for Resale				
4062	Sales of Electricity	Billed WMS	\$ (507,206)			
4066	Sales of Electricity	Billed NW	\$ (489,956)			
4068	Sales of Electricity	Billed CN	\$ (120,517)	\$ (7,285,062)	\$ (7,148,968)	\$ (136,094)



# Fort Frances Power Corporation

## TARIFF OF RATES AND CHARGES

### Effective and Implementation Date May 1, 2014

This schedule supersedes and replaces all previously approved schedules of Rates, Charges and Loss Factors

EB-2013-0130

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## RESIDENTIAL SERVICE CLASSIFICATION

This section governs all services intended to supply electrical energy to buildings or sections of buildings devoted to living quarters such as houses, living accommodations at the rear of stores, self-contained and individually metered suites. These services are commonly referred to as Residential or Domestic Services. Further servicing details are available in the distributor's Conditions of Service.

## APPLICATION

The application of these rates and charges shall be in accordance with the Licence of the Distributor and any Code or Order of the Board, and amendments thereto as approved by the Board, which may be applicable to the administration of this schedule.

No rates and charges for the distribution of electricity and charges to meet the costs of any work or service done or furnished for the purpose of the distribution of electricity shall be made except as permitted by this schedule, unless required by the Distributor's Licence or a Code or Order of the Board, and amendments thereto as approved by the Board, or as specified herein.

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It should be noted that this schedule does not list any charges, assessments or credits that are required by law to be invoiced by a distributor and that are not subject to Board approval, such as the Debt Retirement Charge, the Global Adjustment, the Ontario Clean Energy Benefit and the HST.

## MONTHLY RATES AND CHARGES - Delivery Component

Service Charge	\$	18.79 <sub>¶</sub>
Rate Rider for Smart Metering Entity Charge – Effective until October 18, 2018	\$	0.79
Distribution Volumetric Rate	\$/kWh	0.0137 <sub>¶</sub>
Rate Rider for Disposition of Deferral/Variance Account (2013) - effective until April 30, 2015	\$/kWh	(0.0004)
Rate Rider for Disposition of Global Adjustment Sub-Account (2013) - effective until April 30, 2015		
Applicable only for Non-RPP Customers		
Rate Rider for the Recovery of Stranded Meter Assets – effective until April 30, 2015	\$	0.98
Rate Rider for the Disposition of Deferral/Variance Account (2014) – effective until April 30, 2016	\$/kWh	0.0002
Rate Rider for Disposition of Global Adjustment Sub-Account (2014) – effective until April 30, 2016		
Applicable for Non-RPP Customers		
Rate Rider for Disposition of CGAAP Changes – 1576 Effective until April 30, 2018	\$/kWh	(0.0047)
Rate Adder for GEA Direct	\$/kWh	(0.0004)
Retail Transmission Rate - Network Service Rate	\$/kWh	(0.0063)
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$	0.07
	\$/kWh	0.0067 <sub>¶</sub>
	\$/kWh	0.0016 <sub>¶</sub>

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**Deleted:** Rate Rider for Disposition of Residual Historical Smart Meter Costs-effective until November 30, 2013¶  
Rate Rider for Recovery of Smart Meter Incremental Revenue Requirement – in effect until the effective¶  
date of the next cost of service application¶

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## MONTHLY RATES AND CHARGES - Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural Rate Protection Charge	\$/kWh	0.0013 <sub>¶</sub>
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25

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# Fort Frances Power Corporation

## TARIFF OF RATES AND CHARGES Effective and Implementation Date May 1, 2014

This schedule supersedes and replaces all previously approved schedules of Rates, Charges and Loss Factors

EB-2013-0130

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### GENERAL SERVICE LESS THAN 50 KW SERVICE CLASSIFICATION

This section governs small commercial services and includes small stores, small service stations, restaurants, Churches, small offices and other establishments with similar loads and whose monthly average peak demand is less than, or forecast to be less than, 50 kW. Further servicing details are available in the distributor's Conditions of Service.

#### APPLICATION

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#### MONTHLY RATES AND CHARGES - Delivery Component

Service Charge	\$	43.62
Rate Rider for Smart Metering Entity Charge – Effective until October 18, 2018	\$	0.79
Distribution Volumetric Rate	\$/kWh	0.0099
Rate Rider for Disposition of Deferral/Variance Account (2013) - effective until April 30, 2015	\$/kWh	(0.0004)
Rate Rider for Disposition of Global Adjustment Sub-Account (2013) - effective until April 30, 2015		
Applicable only for Non-RPP Customers	\$/kWh	(0.0063)
Rate Rider for the Recovery of Stranded Meter Assets – effective until April 30, 2015	\$	8.09
Rate Rider for the Disposition of Deferral/Variance Account (2014) – effective until April 30, 2016	\$	0.0003
Rate Rider for the Disposition of Global Adjustment Sub-Account (2014) – effective until April 30, 2016		
Applicable only for Non-RPP Customers	\$/kWh	(0.0047)
Rate Rider for Disposition of CGAAP Changes – 1576 Effective until April 30, 2018	\$/kWh	(0.0004)
Rate Adder for GEA Direct	\$	0.07
Retail Transmission Rate - Network Service Rate	\$/kWh	0.0061
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kWh	0.0014

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**Deleted:** This type of service will normally be applicable to small industry, departmental or larger stores such as supermarkets, shopping centres, storage buildings, large garages, restaurants, office buildings, institutions, hotels, hospitals, schools, colleges, arenas, apartment blocks or buildings and other comparable establishments and whose monthly average peak demand is equal to or greater than, or forecast to be equal to or greater than 50 kW but less than 5,000 kW. Further servicing details are available in the distributor's Conditions of Service.

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Rate Rider for Recovery of Smart Meter Incremental Revenue Requirement – in effect until the Effective date of the next cost of service application

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#### MONTHLY RATES AND CHARGES - Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural Rate Protection Charge	\$/kWh	0.0013
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25

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# Fort Frances Power Corporation

## TARIFF OF RATES AND CHARGES

### Effective and Implementation Date May 1, 2014

This schedule supersedes and replaces all previously approved schedules of Rates, Charges and Loss Factors

EB-2013-0130

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## GENERAL SERVICE 50 TO 4,999 KW SERVICE CLASSIFICATION

This type of service will normally be applicable to small industry, departmental or larger stores such as supermarkets, shopping centres, storage buildings, large garages, restaurants, office buildings, institutions, hotels, hospitals, schools, colleges, arenas, apartment blocks or buildings and other comparable establishments and whose monthly average peak demand is equal to or greater than, or forecast to be equal to or greater than 50 kW but less than 5,000 kW. Further servicing details are available in the distributor's Conditions of Service.

### APPLICATION

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### MONTHLY RATES AND CHARGES - Delivery Component

Service Charge	\$	165.98
Rate Rider for Recovery of Stranded Meter Assets – effective until April 30, 2015	\$	22.51
Distribution Volumetric Rate	\$/kW	2.5081
Rate Rider for Disposition of Deferral/Variance Account (2013) - effective until April 30, 2015	\$/kW	(0.1671)
Rate Rider for Disposition of Global Adjustment Sub-Account (2013) - effective until April 30, 2015	\$/kW	(2.4469)
Applicable only for Non-RPP Customers	\$/kW	2.4949
Retail Transmission Rate - Network Service Rate	\$/kW	0.5770
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kW	0.0063
Rate Rider for Disposition of Deferral/Variance Account (2014) – effective until April 2016	\$/kW	(1.8481)
Rate Rider for Disposition of Global Adjustment Sub-Account (2014) – effective until April 30, 2016	\$/kW	(0.1381)
Applicable only for Non-RPP Customers	\$	0.07
Rate Rider for Disposition of CGAAP Changes – 1576 Effective until April 30, 2018		
Rate Adder for GEA Direct		

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Rate Rider for Recovery of Smart Meter Incremental Revenue Requirement – in effect until the Effective date of the next cost of service application

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### MONTHLY RATES AND CHARGES - Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural Rate Protection Charge	\$/kWh	0.0013
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25



# Fort Frances Power Corporation

## TARIFF OF RATES AND CHARGES

### Effective and Implementation Date May 1, 2014

This schedule supersedes and replaces all previously approved schedules of Rates, Charges and Loss Factors

EB-2013-0130

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## UNMETERED SCATTERED LOAD SERVICE CLASSIFICATION

This classification applies to an account taking electricity at 750 volts or less whose average monthly maximum demand is less than, or is forecast to be less than, 50 kW and the consumption is unmetered. Such connections include cable TV power packs, bus shelters, telephone booths, traffic lights, railway crossings, etc. The level of the consumption will be agreed to by the distributor and the customer, based on detailed manufacturer information/ documentation with regard to electrical consumption of the unmetered load or periodic monitoring of actual consumption. Further servicing details are available in the distributor's Conditions of Service.

### APPLICATION

The application of these rates and charges shall be in accordance with the Licence of the Distributor and any Code or Order of the Board, and amendments thereto as approved by the Board, which may be applicable to the administration of this schedule.

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It should be noted that this schedule does not list any charges, assessments or credits that are required by law to be invoiced by a distributor and that are not subject to Board approval, such as the Debt Retirement Charge, the Global Adjustment, the Ontario Clean Energy Benefit and the HST.

### MONTHLY RATES AND CHARGES - Delivery Component

Service Charge (per customer)	\$	38.24
Distribution Volumetric Rate	\$/kWh	0.0087
Rate Rider for Disposition of Deferral/Variance Account (2013) - effective until April 30, 2015	\$/kWh	(0.0004)
Retail Transmission Rate - Network Service Rate	\$/kWh	0.0061
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kWh	0.0014
Rate Rider for Disposition of Deferral/Variance Account (2014) – effective until April 30, 2016	\$/kWh	(0.0001)
Rate Rider for Disposition of CGAAP Changes – 1576 Effective until April 30, 2018	\$/kWh	(0.0004)
Rate Adder for GEA Direct	\$	0.07

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### MONTHLY RATES AND CHARGES - Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044
Rural Rate Protection Charge	\$/kWh	0.0013
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25

## Fort Frances Power Corporation TARIFF OF RATES AND CHARGES Effective and Implementation Date May 1, 2014

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This schedule supersedes and replaces all previously  
approved schedules of Rates, Charges and Loss Factors

EB-2013-0130

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### STREET LIGHTING SERVICE CLASSIFICATION

This classification refers to an account for roadway lighting with a Municipality within the service boundaries. The consumption for these customers is based on the calculated load times the established hours of use in the OEB load shape template. Further servicing details are available in the distributor's Conditions of Service.

#### APPLICATION

The application of these rates and charges shall be in accordance with the Licence of the Distributor and any Code or Order of the Board, and amendments thereto as approved by the Board, which may be applicable to the administration of this schedule.

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#### MONTHLY RATES AND CHARGES - Delivery Component

Service Charge (per connection)	\$	1.60	Deleted: 17
Distribution Volumetric Rate	\$/kW	4.1605	Deleted: 3.0509
Rate Rider for Disposition of Deferral/Variance Account (2013) - effective until April 30, 2015	\$/kW	(0.1545)	Deleted: )
Rate Rider for Disposition of Global Adjustment Sub-Account (2013) - effective until April 30, 2015			
Applicable only for Non-RPP Customers	\$/kW	(2.2660)	
Retail Transmission Rate - Network Service Rate	\$/kW	1.8817	Deleted: 469
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kW	0.4461	Deleted: 265
Rate Rider for Disposition of Deferral/Variance Account (2014) – effective until April 30, 2016	\$/kW	(0.6102)	
Rate Rider for Disposition of Global Adjustment Sub-Account (2014) – effective until April 30, 2016			
Applicable only for Non-RPP Customers	\$/kW	(1.6400)	Formatted: Font: (Default) Arial, 8 pt
Rate Rider for Disposition of CGAAP Changes – 1576 Effective until April 30, 2016	\$/kW	(0.1225)	
Rate Adder for GEA Direct	\$	0.07	

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#### MONTHLY RATES AND CHARGES - Regulatory Component

Wholesale Market Service Rate	\$/kWh	0.0044	
Rural Rate Protection Charge	\$/kWh	0.0013	Deleted: 2
Standard Supply Service - Administrative Charge (if applicable)	\$	0.25	

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# Fort Frances Power Corporation

## TARIFF OF RATES AND CHARGES

Effective and Implementation Date May 1, 2014

This schedule supersedes and replaces all previously approved schedules of Rates, Charges and Loss Factors

EB-2013-0130

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### MICROFIT SERVICE CLASSIFICATION

This classification applies to an electricity generation facility contracted under the Ontario Power Authority's microFIT program and connected to the distributor's distribution system. Further servicing details are available in the distributor's Conditions of Service.

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### APPLICATION

The application of these rates and charges shall be in accordance with the Licence of the Distributor and any Code or Order of the Board, and amendments thereto as approved by the Board, which may be applicable to the administration of this schedule.

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### MONTHLY RATES AND CHARGES - Delivery Component

Service Charge	\$	5.40
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### ALLOWANCES

Transformer Allowance for Ownership – per kW of billing demand/month	\$/kW	(0.60)
Primary Metering Allowance for transformer losses – applied to measured demand and energy	%	(1.00)

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# Fort Frances Power Corporation

## TARIFF OF RATES AND CHARGES Effective

### and Implementation Date May 1, 2014

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EB-2013-0130

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## SPECIFIC SERVICE CHARGES

### APPLICATION

The application of these rates and charges shall be in accordance with the Licence of the Distributor and any Code or Order of the Board, and amendments thereto as approved by the Board, which may be applicable to the administration of this schedule.

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It should be noted that this schedule does not list any charges, assessments, or credits that are required by law to be invoiced by a distributor and that are not subject to Board approval, such as the Debt Retirement Charge, charges for the Ministry of Energy Conservation and Renewable Energy Program, the Global Adjustment, the Ontario Clean Energy Benefit and the HST.

### Customer Administration

Arrears certificate	\$	15.00
Statement of Account	\$	15.00
Duplicate Invoices for previous billing	\$	15.00
Request for other billing information	\$	15.00
Easement Letter	\$	15.00
Income Tax Letter	\$	15.00
Account History	\$	15.00
Credit Reference/credit check (plus credit agency costs)	\$	25.00
Returned cheque (plus bank charges)	\$	25.00
Legal letter charge	\$	15.00
Account set up charge/change of occupancy charge (plus credit agency costs if applicable)	\$	30.00
Special meter reads	\$	30.00
Meter dispute charge plus Measurement Canada fees (if meter found correct)	\$	30.00

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Collection of account charge – no disconnection – after regular hours . . . . . \$ 165.00¶

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**Deleted:** Temporary Service – Install & remove – overhead – no transformer . . . . . \$ 500.00¶  
Temporary Service – Install & remove – underground – no transformer . . . . . \$ 300.00¶  
Temporary Service – Install & Remove – Overhead – With Transformer . . . . . \$ 1000.00¶

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### Non-Payment of Account

Late Payment – per month	%	1.50
Late Payment – per annum	%	19.56
Disconnect/Reconnect at meter – during regular hours	\$	65.00
Disconnect/Reconnect at meter - after regular hours	\$	185.00
Disconnect/Reconnect at pole – during regular hours	\$	185.00
Disconnect/Reconnect at pole – after hours	\$	415.00
Install/Remove load control device – during regular hours	\$	65.00
Install/Remove load control device – after regular hours	\$	185.00
Service call – customer owned equipment	\$	65.00
Service call – after regular hours	\$	165.00
Specific Charge for Access to the Power Poles - \$/pole/year	\$	22.35

# Fort Frances Power Corporation

## TARIFF OF RATES AND CHARGES

### Effective and Implementation Date May 1, 2014

**This schedule supersedes and replaces all previously  
approved schedules of Rates, Charges and Loss Factors**

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## RETAIL SERVICE CHARGES (if applicable)

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Retail Service Charges refer to services provided by a distributor to retailers or customers related to the supply of competitive electricity.

One-time charge, per retailer, to establish the service agreement between the distributor and the retailer	\$	100.00
Monthly Fixed Charge, per retailer	\$	20.00
Monthly Variable Charge, per customer, per retailer	\$/cust.	0.50
Distributor-consolidated billing monthly charge, per customer, per retailer	\$/cust.	0.30
Retailer-consolidated billing monthly credit, per customer, per retailer	\$/cust.	(0.30)
Service Transaction Requests (STR)		
Request fee, per request, applied to the requesting party	\$	0.25
Processing fee, per request, applied to the requesting party	\$	0.50
Request for customer information as outlined in Section 10.6.3 and Chapter 11 of the Retail Settlement Code directly to retailers and customers, if not delivered electronically through the Electronic Business Transaction (EBT) system, applied to the requesting party		
Up to twice a year	\$	no charge
More than twice a year, per request (plus incremental delivery costs)	\$	2.00

## LOSS FACTORS

If the distributor is not capable of prorating changed loss factors jointly with distribution rates, the revised loss factors will be implemented upon the first subsequent billing for each billing cycle.

Total Loss Factor – Secondary Metered Customer < 5,000 kW	1.0470
Total Loss Factor – Secondary Metered Customer > 5,000 kW	N/A
Distribution Loss Factor - Primary Metered Customer < 5,000 kW	1.0365
Distribution Loss Factor - Primary Metered Customer > 5,000 kW	N/A

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### Revenue Per Rate Class Under Current Rates

Rate Class	Customers/ Connections	Number of Customers/Connections			Test Year Consumption		Current Rates		Revenues at Current Rates	Transformer Allowance Credit	Total
		Start of Test Year	End of Test Year	Average	kWh	kW	Monthly Service Charge	Volumetric			
Residential	Customers	3,292	3,287	3,290	37,751,518		\$ 12.05	\$ 0.0088	\$807,875		\$ 807,875
GS < 50 kW	Customers	407	403	405	13,617,679		\$ 29.03	\$ 0.0066	\$230,962		\$ 230,962
GS > 50 to 4,999 kW	Customers	47	47	47	26,376,324	67,294	\$ 242.06	\$ 3.5943	\$378,397	\$ 9,335	\$ 369,062
Streetlighting	Connections	1,006	1,006	1,006	366,947	1,055	\$ 1.17	\$ 3.0509	\$17,343		\$ 17,343
USL	Customers	6	6	6	48,552		\$ 29.03	\$ 0.0066	\$2,411		\$ 2,411
<b>Total</b>									<b>\$1,436,988</b>	<b>\$ 9,335</b>	<b>\$ 1,427,653</b>

### Revenue Per Rate Class Under Proposed Rates

Rate Class	Customers/ Connections	Number of Customers/Connections			Test Year Consumption		Proposed Rates		Revenues at Proposed Rates	Class Specific Revenue Requirement	Transformer Allowance Credit	Total	Difference
		Start of Test Year	End of Test Year	Average	kWh	kW	Monthly Service Charge	Volumetric					
Residential	Customers	3,292	3,287	3,290	37,751,518		\$ 18.79	\$ 0.0137	\$1,258,912	\$ 1,259,829		\$ 1,259,829	\$ 917
GS < 50 kW	Customers	407	403	405	13,617,679		\$ 43.62	\$ 0.0099	\$346,808	\$ 347,010		\$ 347,010	\$ 202
GS > 50 to 4,999 kW	Customers	47	47	47	26,376,324	67,294	\$ 165.98	\$ 2.5081	\$262,393	\$ 253,058	\$ 9,335	\$ 262,393	\$ 0
Streetlighting	Connections	1,006	1,006	1,006	366,947	1,055	\$ 1.60	\$ 4.1605	\$23,705	\$ 23,651		\$ 23,651	\$ 54
USL	Customers	6	6	6	48,552		\$ 38.24	\$ 0.0087	\$3,176	\$ 3,176		\$ 3,176	\$ 0
<b>Total</b>									<b>\$1,894,993</b>	<b>\$ 1,886,724</b>	<b>\$ 9,335</b>	<b>\$ 1,896,059</b>	<b>\$ 1,066</b>

### Base Revenue Requirement

\$ 1,886,724

### USOA

4235	Specific Service Charges	\$ 9,849
4225	Late Payment Charges	\$ 25,000
4082	Retail Services Revenues	
4084	Service Transactions Req	
4086	SSS Admin Revenue	\$ 11,184
4210	Electric Property-Rent	\$ 48,000
4230	Sales of Water & Power	
4245	Govern Assist Direct Income	
4324	Special Purpose Recovery	
4325	Rev from Merchandise	\$ 25,000
4330	Exp from Merchandise	-\$ 21,000
4355	Gain on Disposition	
4360	Loss on Disposition	
4375	Rev from Non-Utility	\$ 65,000
4380	Exp from Non-Utility	-\$ 60,000
4385	Non-Utility Rental	
4390	Misc Non Operating Income	
	<b>Total Other Revenue</b>	<b>\$ 103,033</b>
	<b>Total Revenue Requirement</b>	<b>\$ 1,989,757</b>